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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE ROBERTO TORRES-HERNANDEZ)

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERTO TORRES-HERNANDEZ,

Defendant.

) Case No. 08cr1165-JM
)
)
) Date: May 16, 2008
) Time: 11:00 a.m.
)

**NOTICE OF MOTIONS AND
MOTIONS TO:**

- (1) COMPEL DISCOVERY;
(2) PRESERVE AND INSPECT EVIDENCE;
and
(3) GRANT LEAVE TO FILE FURTHER
MOTIONS.**

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;
LUELLA CALDITO, ASSISTANT UNITED STATES ATTORNEY;

PLEASE TAKE NOTICE that on May 16, 2008, at 11:00 a.m., or as soon thereafter as counsel may be heard, the accused, Roberto Torres-Hernandez, by and through his attorneys, David M.C. Peterson and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions outlined below.

MOTIONS

Defendant, Mr. Haynes, by and through his attorneys, David M.C. Peterson and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- (1) Compel discovery;
- (2) Preserve and inspect evidence; and,
- (3) Grant leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at or before the time of the hearing on these motions.

Respectfully submitted,

Dated: May 2, 2008

/s/ David M.C. Peterson
DAVID M.C. PETERSON
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Torres-Hernandez
david_peterson@fd.org